

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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JOSEPH BRULO,

Plaintiff

vs.

CONTRACT CALLERS, INC.,  
JH PORTFOLIO DEBT EQUITIES,  
LLC,

Defendants

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**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that Defendant, Contract Callers, Inc. (“CCI”) hereby removes to this Court the state court action described below.

1. On or about July 17, 2019, Plaintiff, Joseph Brulo (“Plaintiff”) filed an action in the Court of Common Pleas of Luzerne County, Pennsylvania, entitled and captioned: *Joseph Brulo v. Contract Callers, Inc., JH Portfolio Debt Equities, LLC*, Docket No. 2019-cv-09012.
2. Defendant was served with the state court lawsuit on September 18, 2019.
3. Pursuant to 28 U.S.C. §1446(b)(2)(a), CCI has obtained the consent of co-Defendant JH Portfolio Debt Equities, LLC, to the removal of this action.
4. Pursuant to 28 U.S.C. §1446(a) CCI has attached as Exhibit A to this Notice of Removal a copy of the documents filed in the Court of Common Pleas of

Luzerne County, Pennsylvania for the removed case, including a copy of all process, pleadings, and Orders served on CCI as of the date of removal.

5. This action is removable to the United States District Court under 28 U.S.C. §§ 1331 and 1441 on the grounds of federal question jurisdiction, in that the Complaint purports to allege a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, and the Telephone Consumer Protection Act, 47 U.S.C. §227.
6. Defendant has filed this Notice of Removal within thirty (30) days after service pursuant to 28 U.S.C. § 1446(b).
7. As required by 28 U.S.C. § 1446(d), Defendant will give notice of the filing of this notice to the clerk of the Court of Common Pleas of Luzerne County, Pennsylvania where this action is currently pending, and to counsel for Plaintiff.

WHEREFORE, Defendant respectfully requests that the above-captioned matter currently pending in the Court of Common Pleas of Luzerne County, Pennsylvania, be removed to this Honorable Court.

THE LAW OFFICES OF RONALD S. CANTER, LLC

/s/ Ronald S. Canter

Ronald S. Canter, Esquire

Bar # 94000

200A Monroe Street, Suite 104

Rockville, Maryland 20850

Telephone: (301) 424-7490

Facsimile: (301) 424-7470

[rcanter@roncanterllc.com](mailto:rcanter@roncanterllc.com)

*Attorney for Defendant Contract Callers, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by First Class Mail postage prepaid, this 8<sup>th</sup> day of October, 2019 to:

Brett M. Freeman, Esq.

Sabatini Freeman, LLC

216 N. Blakely St.

Dunmore, PA 18512

[bfecf@bankruptcypa.com](mailto:bfecf@bankruptcypa.com)

*Attorney for Plaintiff*

/s/ Ronald S. Canter

Ronald S. Canter , Esquire

*Attorney for Defendant Contract Callers, Inc.*